

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Case No. 09-10243-MLW
)	
v.)	
)	
RYAN HARRIS, a/k/a DerEngel,)	
)	
Defendant)	

MOTION TO EXCLUDE 7-29-11 THROUGH 12-12-11

The government asks the Court to exclude from the speedy trial clock the period from July 29, 2011 through December 12, 2011.

The government asks that this time be excluded, under 18 U.S.C. §3161(h)(7)(A), because the ends of justice served by allowing time for the parties to thoroughly brief the issues raised in the defendant's motion to dismiss the indictment or transfer venue outweighed the interest of the public and the defendant in a speedy trial. Furthermore, the time from August 4, 2011 through December 12, 2011 is excludable, under 18 U.S.C. §3161(h)(1)(D), because the defendant's motion to dismiss was pending during this period. The government has asked for the defendant's assent to this motion but has received no response.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Adam Bookbinder
Adam J. Bookbinder
Assistant U.S. Attorney
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Department of Justice Trial Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Adam Bookbinder

Dated: January 7, 2012